IN THE UNITED STATES DISTRICT COURT FOR THE DISTRICT OF PUERTO RICO

UNITED STATES OF AMERICA,Plaintiff,

v.

INDICTMENT

CRIMINAL NO. 15- <u>573</u> (*JAG*)

VIOLATIONS:

Title 18, United States Code, Sections 2252A(a)(2) and (b)(1);

Title 18, United States Code, Sections 2252A(3)(5)(B) and (b)(2);

ANGEL M. ACEVEDO-CRUZADO,
Defendant.

FORFEITURE:

Title 18, United States Code, Section 2253

(Two (2) Counts and a Forfeiture Allegation)

THE GRAND JURY CHARGES:

COUNT ONE

Receipt of Child Pornography
(Title 18, *United States Code*, Sections 2252A(a)(2) and (b)(1))

On or about the months of June and July 2015, in the District of Puerto Rico, and within the jurisdiction of this Court,

ANGEL M. ACEVEDO-CRUZADO,

the defendant herein, did knowingly receive any child pornography, as defined in Title 18, *United States Code*, Section 2256(8)(B) that is, any visual depiction which is a digital image, computer image, or computer-generated image that is, or is indistinguishable from, that of a minor engaging in sexually explicit conduct; that has been mailed, shipped or transported in or affecting interstate or foreign commerce by any means, including by computer. All in violation of Title 18, *United States Code*, Sections 2252A(a)(2) and (b)(1).

COUNT TWO

Possession of Child Pornography Involving Prepubescent Minors (Title 18, *United States Code*, Sections 2252A(a)(5)(B) and (b)(2))

On or about July 30, 2015, in the District of Puerto Rico, and within the jurisdiction of this Court,

ANGEL M. ACEVEDO-CRUZADO,

did knowingly possess material which contains images of child pornography, as defined in Title 18, *United States Code*, Section 2256(8)(B) that is, any visual depiction which is a digital image, computer image, or computer-generated image that is, or is indistinguishable from, that of a minor engaging in sexually explicit conduct; said images involved minors and prepubescent minors, which were produced using materials that had been mailed, shipped and transported in and affecting interstate and foreign commerce, including by computer. All in violation of Title 18, *United States Code*, Sections 2252A(a)(5)(B) and (b)(2).

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FORFEITURE ALLEGATION

(Title 18, United States Code, Section 2253)

For the purpose of alleging forfeiture, and pursuant to Title 18, *United States Code*, Section 2253, the allegations of **COUNTS ONE** and **TWO** of this Indictment are re-alleged as if fully set forth herein.

If convicted of any of the offenses set forth above,

ANGEL M. ACEVEDO-CRUZADO,

the defendant herein, shall forfeit to the United States:

- a) any visual depiction described in this Indictment or any book, magazine, periodical, film, videotape, or other matter which contains any such visual depiction, which was produced, transported, mailed, shipped or received in violation of this chapter;
- b) any property, real or personal, constituting or traceable to gross profits or other proceeds obtained from such offense; and
- c) any property, real or personal, used or intended to be used to commit or to promote the commission of such offense or any property traceable to such property.

Such property includes, but is not limited, to the items listed in the following chart:

Item No.	Description	Qty
1.	Toshiba Samsung Desktop Computer	1
2.	ACER Laptop	1
3.	ACER Laptop	1
4.	Hewlett Packard Laptop	1
5.	Seagate Hard Drive	1
6.	Samsung White Notebook	1
7.	Seagate Hard Drive	1

Item No.	Description	Qty
8.	Toshiba Disk Drive	1
9.	Western Digital Hard Drive	1
10.	LG Cellphone	1
11.	CD	1
12.	DVD's	11
13.	Kodak Memory Card	1

TRUE BILL

FOREPERSON

ROSA EMILIA RODRÍGUEZ-VÉLEZ

United States Attorney

José A. Ruiz-Santiago

Assistant United States Attorney

Chief, Criminal Division

Jenifer Hernández

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